

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

Jay Automotive Group, Inc. d/b/a Jay)	
Suzuki,)	
Plaintiff,)	
)	
v.)	CIVIL ACTION
)	NO. 4-11-CV-129-CDL
American Suzuki Motor Corporation,)	
Defendant.)	

CONSENT MOTION REQUESTING STAY OF DISCOVERY

Plaintiff Jay Automotive Group, Inc. d/b/a Jay Suzuki and Defendant American Suzuki Motor Corporation, by consent and through counsel, hereby move the Court to stay discovery up through and including July 12, 2012, to enable the parties to pursue resolution of this action prior to incurring the significant costs associated with the depositions contemplated in the Joint Scheduling Order.

The length of this proposed stay contemplates that the parties will informally exchange information and documents in efforts to resolve this matter, which will culminate in a mediation to be scheduled no later than June 15, 2012. Should this mediation fail, the proposed stay contemplates an approximate three-week period for the parties to negotiate a revised discovery schedule and to submit the same to the Court for approval. Both parties stipulate that neither party will be prejudiced by the good faith efforts to resolve and mediate this case and all rights to continue discovery, file motions and answer or object to outstanding discovery will be preserved.

Submitted this 24th day of April, 2012.

s/ James E. Butler, Jr.

* signed with express permission by William B. Hill, Jr.

James E. Butler, Jr.

Georgia Bar No. 099625

Joel O. Wooten

Georgia Bar No. 776350

Kate S. Cook

Georgia Bar No. 280584

BUTLER, WOOTEN & FRYHOFFER, LLP

P.O. Box 2766

Columbus, Georgia 31902

Telephone: (706) 322-1990

Facsimile: (706) 323-2962

Attorneys for Plaintiff

Jay Automotive Group, Inc.

s/ William B. Hill, Jr.

William B. Hill, Jr.

Georgia Bar No. 354725

williamhill@asherafuse.com

Joseph C. Sharp

Georgia Bar No. 637965

joesharp@asherafuse.com

Matthew S. Knoop

Georgia Bar No. 140870

mattknoop@asherafuse.com

ASHE, RAFUSE & HILL LLP

1355 Peachtree Street, N.E.

Suite 500

Atlanta, Georgia 30309-3232

Telephone: (404) 253-6000

Facsimile: (404) 253-6060

Attorneys for Defendant

American Suzuki Motor Corporation

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CERTIFICATE OF SERVICE

I hereby certify that on April 24, 2012, I submitted the foregoing **CONSENT MOTION REQUESTING STAY OF DISCOVERY** to the Clerk of Court using the CM/ECF system, which will automatically send electronic mail notification of such filing to the following attorneys of record:

James E. Butler, Esq.
Joel O. Wooten, Esq.
Kate S. Cook, Esq.
BUTLER, WOOTEN & FRYHOFFER, LLP
Post Office Box 2766
Columbus, Georgia 31902

s/ William B. Hill, Jr.
Attorney for Defendant